

MiiCs & Partners America Inc., et al. v. Toshiba, et al.
C.A. No. 1:14-cv-803-RGA

MiiCs & Partners America Inc., et al. v. Funai, et al.
C.A. No. 1:14-cv-804-RGA

EXHIBIT C

Theresa Boyle

From: conner.clint@dorsey.com
Sent: Sunday, July 12, 2015 12:37 PM
To: jrozendaal@khhte.com; Dennis Butler; tseng.david@dorsey.com; Meiklejohn.Paul@dorsey.com; mallard.robert@dorsey.com; bschladweiler@ramllp.com; ihelman@khhte.com; jlano@ram-llp.com; nmozal@ram-llp.com; nagashima@nandhlaw.com
Cc: Aaron Ettelman; Clark Jablon; Denise Porreca; Fred Tecce; John Simmons; Keith Jones; Kimberly Chotkowski; Leslie Kasten; Michael O'Meara; Patricia Rogowski; Stephen Murray; Theresa Boyle
Subject: RE: MiiCs and Partners America, Inc. and Gold Charm Ltd. USDC for theDistrict of Delaware

Counsel,

Toshiba agrees with Funai's proposal.

Regards,

Clint Conner

P: 612-492-6723 F: 612-395-5494

From: Rozendaal, J. C. [mailto:jrozendaal@khhte.com]
Sent: Friday, July 10, 2015 4:57 PM
To: Dennis Butler; Conner, Clint; Tseng, David; Meiklejohn, Paul; Mallard, Robert; Schladweiler, Benjamin; Helman, Igor; Jennifer Lano (jlano@ram-llp.com); Nicholas R. Mozal; Nagashima, Takaaki (nandhlaw.com)
Cc: Aaron Ettelman; Clark Jablon; Denise Porreca; Fred Tecce; JohnSimmons; Keith Jones; Kimberly Chotkowski; Leslie Kasten; Michael O'Meara; PatriciaRogowski; Stephen Murray; Theresa Boyle
Subject: RE: MiiCs and Partners America, Inc. and Gold Charm Ltd. USDC for theDistrict of Delaware

Counsel,

On behalf of Funai, it seems to me that two prior art references per patent would be an unreasonably small number. I would suggest that the parties talk about what limits, if any, on the number of prior art references would be appropriate after we have served our invalidity contentions next week.

In the meantime, I wish you all a good weekend.

Best regards,
J.C.

J.C. Rozendaal

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Evans & Figel, P.L.L.C.
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From: Theresa Boyle [mailto:TBoyle@panitchlaw.com] **On Behalf Of** Dennis Butler
Sent: Thursday, July 02, 2015 1:24 PM
To: Clint Conner; David Tseng; Paul Meiklejohn; Robert Mallard; Schladweiler, Benjamin; Helman, Igor; Jennifer Lano (jlano@ram-llp.com); Rozendaal, J. C.; Nicholas R. Mozal; Nagashima, Takaaki (nandhlaw.com)
Cc: Aaron Ettelman; Clark Jablon; Denise Porreca; DennisButler; Fred Tecce; JohnSimmons; Keith Jones; Kimberly Chotkowski; Leslie Kasten; Michael O'Meara; PatriciaRogowski; Stephen Murray; Theresa Boyle
Subject: MiiCs and Partners America, Inc. and Gold Charm Ltd. USDC for theDistrict of Delaware

Dear Counsel:

In accordance with the Court's Memorandum and Case Management Orders, dated Mach 31, 2015 (copies attached) MiiCs proposes limiting the amount of prior art to two (2) references for each asserted patent or for a total of twenty-four (24) references.

We briefly discussed the limitation on asserted prior art during our meet and confer on April 7, 2015, but did not reach agreement. If defendants disagree with this limitation, please let us know when you are available for a meet and confer.

Thank you.

Theresa

Theresa Boyle
Legal Assistant to John D. Simmons, Dennis Butler and Keith A. Jones
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